

Law Office of G. Anthony Long
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Attorney for Defendant Dong Guk

**IN THE UNITED STATES DISTRICT COURT
FOR THE
NORTHERN MARIANA ISLANDS**

JUNG SOON LEE, (Deceased)) CIVIL ACTION NO. 05-0031
By SUNG YOUNG LEE, Personal)
Representative)
Plaintiff)
v.) DEFENDANT'S REQUEST FOR
DONG GUK CORPORATION) PRODUCTION OF DOCUMENTS
Defendant)

TO: PLAINTIFF AND HIS ATTORNEYS OF RECORD:

This request for production of documents is served upon you by defendant pursuant to Rule 34 of the Federal Rules of Civil Procedure. The responses to this request, which are due within thirty (30) days of service upon you, shall be delivered to the Law Office of G. Anthony Long, P. O. Box 504970, Beach Road, San Jose, Saipan, MP 96950.

A. INSTRUCTIONS FOR USE

1. In this request:
 - (a) The words "you" and "your" means Sung Young Lee, personal representative for Jung Soon Lee, (deceased), which includes the heirs of Sung Young Lee, (deceased).

- (b) The term "Jung Soon Lee" means Jung Soon Lee, (deceased).
- (c) The term "Accident " means the motor vehicle accident which occurred on or about August 2, 2004 as alleged in your complaint, which includes the death of Jung Soon Lee, (deceased).
- (d) The term "Lawsuit" means the civil action filed by you in the Commonwealth of the Northern Mariana Islands which was removed to the U. S. District Court for the Northern Mariana Islands and has the Civil action number 05-0031
- (e) The word "person(s)" means all entities and, without limiting the generality of the foregoing, includes natural persons, joint owners, associations, companies, partnerships, joint ventures, corporations, governmental entities, trusts and estates.
- (e) The word "document(s)" means all written, printed, recorded, and graphic matter, photographic matter or sound reproductions, however produced or reproduced, which includes e-mail and other electronic documents .
- (f) The word "Communication" or "Communications" includes but is not limited to document, documents, or documentation.

2. If any document otherwise covered by this request is no longer in or subject to your possession, custody or control, identify each such document and state the dispositions of each such document including, but not limited to, the date of disposition and the person or persons presently possessing or controlling each such document. If you refuse to produce any documents specified herein by reason of a claim of privilege, then in the case of each such document, identify such document in writing by stating the nature of the document, the date thereof, the

author, the addressee, the title, the file or other number of other identifying mark or code, its custodian and the location of the document so identified, state in writing the type of privilege claimed and all of the circumstances relied upon to support the claim of privilege.

Please produce the following:

1. The medical records of Jung Soon Lee following the accident.
2. Jung Soon Lee's death certificate.
3. Each police report prepared in connection with the accident by the Commonwealth of Northern Mariana Islands Department of Public Safety.
4. Each report prepared by you, by you or by anyone on your behalf or at your direction or instruction in connection with the accident or this Lawsuit.
5. The documentation showing the duties defendant owed to Jung Soon Lee which you claim defendant's breached.
6. The documentation supporting the economic damages you contend you are entitled to recover from defendant.
7. The documentation supporting the non-economic damages you contend you are entitled to recover from defendant.
8. The documentation reflecting the calculation of the economic damages you claim in this Lawsuit.
9. The documentation reflecting the calculation of the economic damages you claim in this Lawsuit.
10. A copy of the family census for Jung Soon Lee maintained in Korea.

11. Jung Soon Lee's transcript from the Northern Marianas College.
12. Jung Soon Lee's passport.
13. The medical records of Gyn Jin Kim
14. A copy of each written statement from anyone in connection with the accident which is in your custody, possession or control
15. Each photograph, electronic image, drawing or other depiction of the accident scene or accident site in your custody, possession or control.
16. Each document identified in your answers to interrogatories not already being produced pursuant to the production request.
17. Each document identified in your complaint in this lawsuit not already being produced pursuant to the production request.

Law Office of G. Anthony Long

By: /s/ _____
G. Anthony Long